

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DANIEL FLORES	:	VIOLATIONS:
MOSES BAYON	:	18 U.S.C. § 922(g)(1) (felon in possession of a firearm - 1 count)
	:	18 U.S.C. § 922(j) (possession of a stolen firearm – 1 count)
	:	18 U.S.C. § 922(k) (possession of a firearm with an obliterated serial number – 1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 15, 2004, in Whitehall Township, in the Eastern District of
Pennsylvania, defendant

DANIEL FLORES,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Sig Sauer, Model P228, 9mm parabellum semiautomatic handgun, with an obliterated serial number.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2004, in Whitehall Township, in the Eastern District of Pennsylvania, defendants

**DANIEL FLORES and
MOSES BAYON**

knowingly possessed, and aided and abetted the possession of, a stolen firearm, that is, a Sig Sauer, Model P228, 9mm parabellum semiautomatic handgun, with an obliterated serial number, which had been shipped and transported in interstate or foreign commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen.

In violation of Title 18, United States Code, Sections 922(j) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2004, in Whitehall Township, in the Eastern District of Pennsylvania, defendants

**DANIEL FLORES and
MOSES BAYON**

knowingly possessed a firearm, that is, a Sig Sauer, Model P228, 9mm parabellum semiautomatic handgun, which had the serial number removed, obliterated, and altered and had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(k) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1), (j) and (k), set forth in this indictment, the defendants

**DANIEL FLORES and
MOSES BAYON**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

1. Sig Sauer, Model P228, 9mm parabellum semiautomatic handgun, with obliterated serial number.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**